

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Criminal Case No. 24-274

vs.

J. Ranjan

DONALD SMITH

SUPPLEMENTAL REPLY TO RESPONSE IN OPPOSITION
BY THE GOVERNMENT

That, Donald Smith, Defendant, through his counsel, respectfully files the within Supplemental Reply to Response in Opposition by the Government and in support thereof avers:

1. That defendant as previously stated had been awarded 392 contracts by the DLA (Doc. 28 at 1). These awards date from 1/03/2023 to 12/17/2024 (Please see Exhibit 1 attached hereto and incorporated herein) and those which are included in Counts 4 – 8 (Doc. 3 at 6) so as to show this Honorable Court the full spectrum of awards.

2. That the Government has not alleged nonconforming as to @ 387 contracts though the exact same products in some instances were provided with no issue from the Defense Logistics Agency (DLA).

3. That the @ 387 contracts awarded with no issue support defendants original request to Amend Conditions of Release.

Respectfully submitted,
/s/ Michael J. Machen
Michael J. Machen
Defense Counsel for Donald Smith